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6 Attorneys for Plaintiff  
7 United States of America

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, )  
11 Plaintiff, )  
12 v. )  
13 \$9,224.00 IN U.S. CURRENCY, )  
14 Defendant. )

FILED  
2008 AUG -1 PM 4:01

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY  DEPUTY

'08 CV 1402 J WMc

16 By way of complaint against the defendant, \$9,224.00 IN U.S. CURRENCY (hereinafter  
17 "defendant currency"), the United States of America alleges:

18 1. This Court has jurisdiction over this action by virtue of the provisions of Title 28,  
19 United States Code, Section 1355, and Title 21, United States Code, Section 881.

20 2. Venue is proper in this district pursuant to Title 28, United States Code, Section 1395,  
21 because the defendant property was found within this district.

22 3. On March 6, 2008, El Cajon Police Department ("ECPD") detectives served a state  
23 search warrant at 3009 Manos Drive San Diego, CA. Prior to the warrant being served, detectives  
24 detained Khalid Tousaint Harrison ("Harrison") at the intersection of 32nd Street and J Street. Harrison  
25 was advised of the search warrant for his person and residence, and a search of Harrison located \$224.00  
26 in U.S. currency in his left front shorts pocket. Harrison told detectives he had cocaine hidden in a  
27 laundry hamper in his bedroom and a pistol hidden in the headboard of his bed. Harrison denied having  
28 any cash at the residence.

DMM:tlr[2008V00284]

1  
2 A search of the residence located the cocaine (1,034.47 grams net weight) as described  
3 by Harrison, and an additional 6.2 grams net weight of cocaine on a plate in the bedroom. Detectives  
4 found a loaded .45 caliber pistol hidden in the headboard as described by Harrison. A search of the  
5 master bedroom closet located a large amount of cash, \$9,000.00 in U.S. currency in \$100.00 bills  
6 wrapped with a rubber band, in a jacket pocket. In the master bedroom, detectives located packaging  
7 materials and a digital scale. The cash located was seized as narcotics proceeds.

8 At ECPD, Harrison denied dealing large quantities of drugs, stating, "Sometimes I push  
9 a little." Harrison claimed to just be holding onto the cocaine located in his bedroom, stating he is paid  
10 \$250.00 when the cocaine is dropped off to him and another \$250.00 when it is picked up. Harrison  
11 stated he had the pistol because he had been car-jacked in the past. Harrison had told detectives initially  
12 that the cash found at the house was from his wife cashing her tax refund check. A detective spoke with  
13 Tisha Harrison ("T. Harrison"), Harrison's wife on the telephone, and she denied any knowledge of  
14 cocaine being in the house, or being sold from the house. She stated she had not been staying at the  
15 house for personal reasons. T. Harrison stated the refund was between \$2,000.00-\$3,000.00, and that  
16 the money was in a dresser drawer. She denied knowledge of the \$9,000.00 located when it was  
17 described to her. Harrison was informed that detective had spoken with his wife regarding the cash  
18 found in the jacket of his closet, and Harrison changed his story and stated the cash was the remainder  
19 from an \$11,000.00 settlement from Las Vegas. On March 25, 2008, DEA adopted this seizure.

20 4. On and/or prior to March 6, 2008, the defendant currency was a thing of value furnished  
21 or intended to be furnished in exchange for a controlled substance or listed chemical in violation of  
22 Title 21 of the United States Code, Section 881.

23 5. Alternatively, on and/or prior to March 6, 2008, the defendant currency represented the  
24 proceeds of or proceeds traceable to an exchange for a controlled substance or listed chemical in  
25 violation of Title 21 of the United States Code, Section 881.

26 6. Alternatively, on and/or prior to March 6, 2008, the defendant currency was used or was  
27 intended to be used to facilitate a violation of Title 21 of the United States Code, Section 881.

28 7. Because of the aforementioned acts or uses alleged herein, either singly or in

1 combination, the defendant currency is subject to forfeiture pursuant to Title 21, United States Code,  
2 Section 881(a)(6).

3 8. The defendant currency is presently stored within the jurisdiction of this Court.

4 WHEREFORE, the United States prays that due process issue to enforce the forfeiture of the  
5 defendant, and that due notice be given to all interested parties to appear and show cause why said  
6 forfeiture should not be declared.

7  
8 DATED: 8-1-08

9 KAREN P. HEWITT  
10 United States Attorney

11 *David M. McNeer*

12 DAVID M. McNEES  
13 Special Assistant U.S. Attorney  
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VERIFICATION

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I, Jon Wooddell, hereby state and declare as follows:

1. I am a Special Agent with the Drug Enforcement Administration.

2. I have read the foregoing complaint and know its contents.

3. The information in the complaint was furnished by official Government sources.

Based on this information, I believe the allegations in the complaint to be true.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief.

Executed on 08-01-2008



JON WOODDELL  
Special Agent, DEA

JS 44 (Rev. 12/07)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Office of the US Attorney SAUSA David M. McNees (619) 557-5979  
880 Front Street, Room 6293, San Diego, CA 92101-8893

DEFENDANTS FILED

\$9,224.00 in U.S. Currency

2008 AUG -1 PM 4:01

County of Residence of First Listed Defendant

CLERK US DISTRICT COURT (PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

BY *[Signature]*  
Attorneys (If Known)

DEPUTY

08 CV 1402 J WMC

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

|   |  |   |   |  |  |
|---|--|---|---|--|--|
| <input type="checkbox"/> 110 Insurance  | <input type="checkbox"/> 310 Airplane                          | <input type="checkbox"/> 362 Personal Injury - Med. Malpractice         | <input type="checkbox"/> 610 Agriculture  | <input type="checkbox"/> 422 Appeal 28 USC 158                   | <input type="checkbox"/> 400 State Reapportionment                                     |
| <input type="checkbox"/> 120 Marine   | <input type="checkbox"/> 315 Airplane Product Liability        | <input type="checkbox"/> 365 Personal Injury - Product Liability        | <input type="checkbox"/> 620 Other Food & Drug                                      | <input type="checkbox"/> 423 Withdrawal 28 USC 157               | <input type="checkbox"/> 410 Antitrust   |
| <input type="checkbox"/> 130 Miller Act   | <input type="checkbox"/> 320 Assault, Libel & Slander          | <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability | <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 | <input type="checkbox"/> 820 Copyrights                          | <input type="checkbox"/> 430 Banks and Banking   |
| <input type="checkbox"/> 140 Negotiable Instrument                                | <input type="checkbox"/> 330 Federal Employers' Liability      | <input type="checkbox"/> 370 Other Fraud                                | <input type="checkbox"/> 630 Liquor Laws  | <input type="checkbox"/> 830 Patent                              | <input type="checkbox"/> 450 Commerce  |
| <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment    | <input type="checkbox"/> 340 Marine                            | <input type="checkbox"/> 371 Truth in Lending                           | <input type="checkbox"/> 640 R.R. & Truck   | <input type="checkbox"/> 840 Trademark                           | <input type="checkbox"/> 460 Deportation   |
| <input type="checkbox"/> 151 Medicare Act   | <input type="checkbox"/> 345 Marine Product Liability          | <input type="checkbox"/> 380 Other Personal Property Damage             | <input type="checkbox"/> 650 Airline Regs.  | <input type="checkbox"/> 861 HIA (1395f)                         | <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations            |
| <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) | <input type="checkbox"/> 350 Motor Vehicle                     | <input type="checkbox"/> 385 Property Damage Product Liability          | <input type="checkbox"/> 660 Occupational Safety/Health                             | <input type="checkbox"/> 862 Black Lung (923)                    | <input type="checkbox"/> 480 Consumer Credit   |
| <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits        | <input type="checkbox"/> 355 Motor Vehicle Product Liability   |   | <input type="checkbox"/> 690 Other  | <input type="checkbox"/> 863 DIWC/DIWW (405(g))                  | <input type="checkbox"/> 490 Cable/Sat TV  |
| <input type="checkbox"/> 160 Stockholders' Suits                                  | <input type="checkbox"/> 360 Other Personal Injury             |   | <input type="checkbox"/> 710 Fair Labor Standards Act                               | <input type="checkbox"/> 864 SSID Title XVI                      | <input type="checkbox"/> 490 Cable/Sat TV  |
| <input type="checkbox"/> 190 Other Contract                                       |  |   | <input type="checkbox"/> 720 Labor/Mgmt. Relations & Disclosure Act                 | <input type="checkbox"/> 865 RSI (405(g))                        | <input type="checkbox"/> 810 Selective Service   |
| <input type="checkbox"/> 195 Contract Product Liability                           |  |   | <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act                 | <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) | <input type="checkbox"/> 850 Securities/Commodities/Exchange                           |
| <input type="checkbox"/> 196 Franchise  |  |   | <input type="checkbox"/> 740 Railway Labor Act                                      | <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609         | <input type="checkbox"/> 875 Customer Challenge 12 USC 3410                            |
| <input type="checkbox"/> 210 Land Condemnation                                    | <input type="checkbox"/> 441 Voting                            | <input type="checkbox"/> 510 Motions to Vacate Sentence                 | <input type="checkbox"/> 790 Other Labor Litigation                                 |  | <input type="checkbox"/> 890 Other Statutory Actions                                   |
| <input type="checkbox"/> 220 Foreclosure  | <input type="checkbox"/> 442 Employment                        | <input type="checkbox"/> 530 General                                    | <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act                           |  | <input type="checkbox"/> 891 Agricultural Acts   |
| <input type="checkbox"/> 230 Rent Lease & Ejectment                               | <input type="checkbox"/> 443 Housing/Accommodations            | <input type="checkbox"/> 535 Death Penalty                              |   |  | <input type="checkbox"/> 892 Economic Stabilization Act                                |
| <input type="checkbox"/> 240 Torts to Land  | <input type="checkbox"/> 444 Welfare                           | <input type="checkbox"/> 540 Mandamus & Other                           | <input type="checkbox"/> 462 Naturalization Application                             |  | <input type="checkbox"/> 893 Environmental Matters                                     |
| <input type="checkbox"/> 245 Tort Product Liability                               | <input type="checkbox"/> 445 Amer. w/Disabilities - Employment | <input type="checkbox"/> 550 Civil Rights                               | <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee                         |  | <input type="checkbox"/> 894 Energy Allocation Act                                     |
| <input type="checkbox"/> 290 All Other Real Property                              | <input type="checkbox"/> 446 Amer. w/Disabilities - Other      | <input type="checkbox"/> 555 Prison Condition                           | <input type="checkbox"/> 465 Other Immigration Actions                              |  | <input type="checkbox"/> 895 Freedom of Information Act                                |
|   | <input type="checkbox"/> 440 Other Civil Rights                |   |   |  | <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice |
|   |  |   |   |  | <input type="checkbox"/> 950 Constitutionality of State Statutes                       |

## V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

21 U.S.C. Section 881

Brief description of cause:  
narcotics trafficking

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

August 1, 2008

David M. McNees

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE